



February 2, 2005

Barry L. Carpenter
Deputy Administrator
AMS Livestock and Seed Program
USDA
Stop 0249
1400 Independence Ave, S.W.
Washington, DC 20250-0249

RE: Docket Number LS-03-04, Mandatory Country-of-Origin Labeling of Fish and Shellfish

Dear Deputy Administrator Carpenter:

Florida Fruit and Vegetable Association (FFVA) appreciates the opportunity to provide comments on USDA's rules for mandatory country of origin labeling (COOL) of fish and shellfish. FFVA provides these comments on fish in anticipation of the pending adoption of country of origin labeling of fruits and vegetables in 2006. FFVA is an organization comprised of growers of vegetables, citrus, tropical fruits and other agricultural commodities in Florida.

FFVA believes USDA is moving in the right direction by adopting more flexible rules regarding COOL for blended and commingled products. A simplified approach to identifying the origins of products that are blended or commingled will reduce costs and still ensure notification to consumers.

Additionally, FFVA agrees with USDA's view that a wide variety of packaging and labeling methods should be allowed to convey origin information. With the growing adoption of sophisticated and creative packaging and labeling of food products, as well as in-store displays, this flexible approach will permit origin notification to consumers using existing packaging or labeling materials.

FFVA believes that recordkeeping requirements should be as flexible as possible, allowing full use of existing labels, bills of sale and other customary documents to prove country of origin. We strongly urge USDA to consider use of existing recordkeeping requirements to achieve COOL verification. The FDA's new bioterrorism records requirements and USDA's PACA records requirements (for produce) are examples.

Thank you for the opportunity to provide comments on the implementation of mandatory country-of-origin labeling of fish and shellfish.

Sincerely,

Ray Gilmer
Director, Public Affairs